

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

SAMANTHA JENKINS, EDWARD BROWN,	)	
KEILEE FANT, BYEON WELLS, MELDON	)	
MOFFIT, ALLISON NELSON, HERBERT	)	
NELSON, JR., and TONYA DEBERRY, <i>et al.</i> ,	)	
	)	Case No.: 4:15-CV-00252-CEJ
Plaintiffs,	)	
	)	
v.	)	
	)	
THE CITY OF JENNINGS,	)	
	)	
Defendant.	)	

**JOINT STATUS REPORT AND MOTION TO**  
**STAY ALL PROCEEDINGS FOR AN ADDITIONAL 90 DAYS**

Defendant The City of Jennings (“Defendant”), by and through counsel, and Plaintiff Samantha Jenkins, Edward Brown, Keilee Fant, Byeon Wells, Meldon Moffitt, Allison Nelson, Herbert Nelson, Jr., and Tonya DeBerry (“Plaintiffs”), by and through counsel, hereby file this Joint Status Report and Motion to Stay all Proceedings for an Additional 90 Days until December 28, 2015, and state:

1. On March 27, 2015, the Court granted the Parties’ Joint Motion to Stay all Proceedings until June 29, 2015 so the Parties could attempt to negotiate a reasonable resolution of Plaintiffs’ claims to bring an end to this litigation. The Court also requested that the Parties file a Joint Status Report on June 29, 2015 (Doc. No. 9). On June 29, 2015, the Parties filed a Joint Status Report and Motion to Stay All Proceedings for an Additional 90 Days (Doc. No. 11). On June 30, 2015, the Court granted the Joint Motion to Stay All Proceedings until September 29, 2015 and requested the Parties to file a Joint Status Report by September 29, 2015 (Doc. No. 12).

2. Since the stay was entered by the Court, the Parties have met on numerous occasions to negotiate a resolution of the various constitutional claims asserted by the Plaintiffs concerning the operation of the Jennings Municipal Court and the requests of the Plaintiffs for declaratory judgments and injunctive relief concerning the operation of the Jennings Municipal Court. The Parties have spent in excess of eighty (80) hours negotiating the complex and detailed constitutional issues relating to the operation of the municipal court and the Plaintiffs' requests for declaratory judgments and injunctive relief, and exchanged various proposals and counter proposals to resolve the constitutional claims.

3. The Parties agreed to the resolution of the various constitutional claims asserted by the Plaintiffs concerning the operation of the Jennings Municipal Court and the Plaintiffs' requests for declaratory judgments and injunctive relief about the operation of the Jennings Municipal Court, which were approved by the City Council for the City of Jennings. The Parties filed a Joint Motion for Entry of Final Declaratory and Injunctive Relief and Joint Stipulation of Dismissal with the Court on August 26, 2015 and a proposed order (Doc. No. 13). On September 16, 2015, the Court entered an Order granting the motion in part and granting the Parties' request for the entry of an injunction pursuant to the Parties' Settlement Agreement (Doc. No. 16). The Court entered a Permanent Injunction on September 16, 2015 (Doc. No. 17) and dismissed the remaining claims for equitable and declaratory relief in the Order of August 26, 2015 (Doc. No. 16). Since the Court entered the Permanent Injunction, Counsel for the Defendant has been working diligently to implement the terms of the Permanent Injunction and train the employees of the Defendant about the requirements of the injunction.

4. Counsel for the Defendant and counsel for the Plaintiffs have begun the negotiation of the request for damages made by the Plaintiffs on behalf of themselves and the

class. The Parties request the Court to extend the stay of this case for an additional ninety (90) days so that the Parties can engage in negotiations in an attempt to resolve the damage claims of the Plaintiffs and the class.

5. This request by the Parties to stay these proceedings for an additional ninety (90) days is not made for the purpose of vexation or to delay this matter, but to allow the Parties to engage in negotiations in an attempt to resolve the claims for damages in the Class Action Complaint without engaging in time-consuming litigation for which the Plaintiffs and Defendant will incur substantial legal fees and expenses.

6. The undersigned counsel respectfully request the Court to schedule a hearing on this Joint Status Report and Motion to Stay this Case for an Additional 90 Days if the Court desires additional information from the Parties concerning the report and the motion for a stay of the proceedings.

**WHEREFORE**, Defendant and the Plaintiffs respectfully request the Court to enter an Order granting the Joint Motion to Stay all Proceedings in this Case for an Additional 90 Days until December 28, 2015.

Respectfully submitted,

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*A Professional Corporation*

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